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June 26, 2024

Via ECF

Hon. Julia K. Munley
United States District Judge
United States District Court
Middle District of Pennsylvania

Re: Northfield Insurance Company v. JVA Deicing, Inc., et al.,
M.D. Pa. Case No. 3:23-CV-00461-JPW

Dear Judge Munley:

This office represents Plaintiff Northfield Insurance Company (“Northfield”). I write to follow up on the Third Motion to Extend Case Management Deadlines, filed with this Court on June 5, 2024, and granted on June 25, 2024.

As part of that motion, Northfield and Defendant Carol Donahue, individually and as Administratrix of the Estate of Mark Donahue, deceased (“Ms. Donahue”), requested that the Court schedule a conference to discuss two outstanding discovery issues. The Court has not yet scheduled a conference to discuss those issues, and fact discovery, under the Order issued on June 25, 2024, is scheduled to close on July 1, 2024.

Accordingly, Northfield asks that the Court schedule a telephone conference as soon as possible to discuss the two remaining discovery issues in this action, at which point the Court and parties also can discuss if a brief additional extension of the discovery period is necessary to resolve the outstanding discovery disputes and complete any necessary additional productions as a result. Northfield notes that its dispute with Ms. Donahue, over whether certain documents from Northfield’s files are subject to production, may best be resolved via *in camera* review. However, Northfield also has a remaining dispute with Defendants JVA Deicing, Inc. and Joseph Tuzze over whether they are required to search for and produce certain emails responsive to Northfield’s document demands in this action.

Respectfully,

/s/ Amy C. Gross

Amy C. Gross

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cc: All Counsel of Record (by ECF)